



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 9, 2020

BY EMAIL & ECF

Honorable Victor Marrero
United States District Judge
Southern District of New York
New York, New York 10007

Re: *United States v. Narek Marutyan, et al.*, 20 Cr. 652 (VM)

Dear Judge Marrero:

The Government respectfully writes to request the Court schedule an initial conference in the above-referenced matter.

On or about December 3, 2020, a Grand Jury in the Southern District of New York returned indictment 20 Cr. 652 (the "Indictment") charging Narek Marutyan ("Narek"), Albert Marutyan ("Albert"), Mikayel Yeghoyan ("Mikayel"), Davit Yeghoyan ("Davit"), and Vahe Hovhannisyan with participating in a racketeering conspiracy, in violation of Title 18, United States Code, Section 1962(d). The Indictment also charged the aforementioned defendants, as well as Lusine Ghazaryan and Saro Mouradian, with participating in a conspiracy to commit fraud relating to means of identification, in violation of Title 18, United States Code, Section 1028(f), and participating in a conspiracy to commit access device fraud, in violation of Title 18, United States Code, Section 1029(b)(2), and charged Narek, Albert, Mikayel, Davit, Hovhannisyan, Ghazaryan, Mouradian and Zaven Yerkaryan (collectively, the "Defendants") with participating in a conspiracy to commit mail fraud and wire fraud, in violation of Title 18, United States Code, Section 1349. The Indictment further charged Mikayel and Davit each with one count of aggravated identity theft, in violation of Title 18, United States Code, Section 1028A.

On or about December 8, 2020, the Indictment was unsealed by the Honorable Sarah Netburn and assigned to Your Honor. On December 8, 2020, defendants Albert, Hovhannisyan and Yerkaryan were arrested and presented in the Central District of California. On December 8, 2020, defendants Mikayel, Davit, and Ghazaryan were arrested, presented and arraigned before Judge Netburn, who set a control date of December 29, 2020 and excluded time through that date. On December 9, 2020, defendant Mouradian was presented in the Southern District of Florida. Therefore, defendants Albert, Hovhannisyan, Yerkaryan and Mouradian, i.e., the defendants presented outside of this District, need to arraigned on the Indictment. Narek Marutyan remains a fugitive.

Accordingly, the Government respectfully requests that the Court set an initial conference at the Court's convenience.

Respectfully submitted,

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